

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20060001
Agency Interest No. 31170

Kerry Youngblood
Plant Manager
Natalbany Plywood Mill
PO Box 970
Natalbany, LA 70451-0970

RE: Part 70 Operating Permit Renewal and Modification, Natalbany Plywood Mill
Hunt Forest Products Inc, Natalbany, Tangipahoa Parish, Louisiana

Dear Mr. Youngblood:

This is to inform you that the permit renewal and modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2008.

Permit No.: 2840-00014-V1

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:slp
cc: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Hunt Forest Products, Inc. - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

I. Background

Hunt Forest Products, Inc. - Natalbany Plywood Mill, an existing plywood and veneer plant began operation in 1979. The Hunt Forest Products Inc - Natalbany Plywood Mill currently operates under Permit No. 2840-00014-V1, issued January 27, 2002.

This is the Part 70 operating permit renewal for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Hunt Forest Products, Inc. on May 3, 2006 requesting a Part 70 operating permit renewal and modification. Additional information dated May 13, 2007, September 19, 2007, November 1, 2007, January 10, 2008, February 22, 2008, and March 5, 2008 was also received.

III. Description

Using southern yellow pine as its primary raw material, the Natalbany Plywood Mill produces veneer, plywood, wood chips, and landscape timbers. Logs arrive by truck and are scaled, inventoried, and stacked in the log yard. The logs are debarked, cut to block length, heated and latheed to yield green veneer. Green veneer is routed through the veneer dryers for drying. Glue is applied to the dry veneer at the layup-line. Stacked and glued veneers are then pressed to form sheets of plywood. Pressed plywood is trimmed, patched (if necessary), and sanded in finishing operation. Veneer not used to make plywood on-site, may be sold as green and/or dried veneer. Log cores from the latheing operation are processed in the chipper saw to yield green landscape timbers and chips. Wood chips are conveyed to the truck loading facility and transferred off site. Hogged bark and wood residue materials are used as boiler fuel for steam generation. The steam generated by these boilers provides heat for the log heating, drying, and pressing operations.

As a result of a technical review of a Request for an Extension, dated September 19, 2007, and as allowed under 40 CFR 63.6(i)(4)(i)(A), the Department granted an extension until October 1, 2008 for the facility to be in compliance with 40 CFR 63 Subpart DDDD.

Prevention of Significant Deterioration (PSD) does not apply to the Natalbany Plywood Mill. The PM₁₀ increase for the Wood-fired Boiler, Source ID No. 1-94, is due to an emission factor reconciliation. Therefore, a PSD analysis is not required. The VOC increase for Plywood Press No. 2, Source ID No. 2-96, required a PSD netting analysis. The decommissioning of Plywood Press No. 1, Source ID No. 1-96, offset the increases for

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Hunt Forest Products, Inc. - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

Plywood Press No. 2, Source ID No. 2-96. As shown in the tables below, a BACT analysis was not required.

Tier I – Determination of Significant Emissions Increase

Pollutant	Baseline Actual (tpy)	PTE (tpy)	Change (tpy)	PSD Significant Level (tpy)	Emissions > Significant Level?
VOC	20.3	65	44.7	40	Yes

Tier II – Determination of Significant Net Emissions Increase

Pollutant	PTE (tpy)	Baseline Actual (tpy)	Increase/ Decrease (tpy)	Net Change (tpy)	PSD Significant Level (tpy)	Emissions > Significant Level?
VOC	65	20.3	-17.3	27.4	40	No

In addition to the requirement to request a renewal to its existing Part 70 permit, Hunt is submitting this application to effect the following changes:

- Modification of Plywood Press No. 2, Source ID No. 2-96, and removal of Plywood Press No. 1, Source ID No. 1-96;
- Reconcile various emissions at the facility due to changes in emission factors;
- Remove Source ID Nos. 12-94 and 13-94 and move them to the list of Insignificant Activities;
- Incorporate emissions of toxic air pollutants from the various sources into the permit; and
- Install a Regenerative Thermal Oxidizer (RTO) for compliance with 40 CFR 63, Subpart DDDD.

Phase I represents emissions prior to start-up of the regenerative thermal oxidizer (RTO); Phase II represents emissions after start-up of the RTO. Phase II will be effective October 1, 2008.

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products, Inc. - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>Phase I</u>	<u>Phase II</u>	<u>Change</u>
PM ₁₀	214.33	255.79	241.79	+ 27.46
SO ₂	3.03	8.93	8.93	+ 5.90
NO _x	111.04	95.00	120.10	+ 9.06
CO	491.63	505.92	478.82	-12.81
VOC	271.76	264.91	98.87	-172.89

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>Phase I</u>	<u>Phase II</u>	<u>Change</u>
Acetaldehyde	-	7.04	1.74	+ 1.74
Acrolein	-	2.20	1.44	+ 1.44
Benzene	-	1.95	1.54	+ 1.54
Formaldehyde	1.07	8.20	2.80	+ 1.73
n-Hexane	-	<0.001	<0.001	<0.001
Methanol	8.69	17.63	13.65	+ 4.96
MEK	-	0.35	0.11	+ 0.11
MIBK	-	0.61	0.78	+ 0.78
MTBE	-	0.03	0.03	+ 0.03
Phenol	-	1.91	1.51	+ 1.51
Propionaldehyde	-	0.26	0.02	+ 0.02
Styrene	-	0.67	0.67	+ 0.67
Toluene	-	0.97	0.35	+ 0.35
Xylenes	-	0.50	0.43	+ 0.43
Total	9.76	42.39	25.07	+ 15.31

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Hunt Forest Products, Inc. - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	Phase I	Phase II	Change
Arsenic	-	0.008	0.008	+ 0.008
Beryllium	-	<0.001	<0.001	<0.001
Cadmium	-	0.001	0.001	+ 0.001
Chromium	-	0.007	0.007	+ 0.007
Lead	-	0.020	0.020	+ 0.020
Manganese	-	0.910	0.910	+ 0.910
Mercury	-	0.001	0.001	+ 0.001
Nickel	-	0.012	0.012	+ 0.012
Selenium	-	0.001	0.001	+ 0.001
Hydrogen Chloride	-	6.75	6.75	+ 6.75
Total	-	7.70	7.70	+ 7.70

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, and National Emission Standards for Hazardous Air Pollutants (NESHAP). New Source Performance Standards (NSPS) and Prevention of Significant Deterioration (PSD) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Hunt Forest Products, Inc. - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Dispersion Model(s) Used: ISCST3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
PM ₁₀	Annual	0.74 µg/m ³	50 µg/m ³
Acetaldehyde	Annual	8.66 µg/m ³	45.50 µg/m ³
Acrolein	8 hr	0.20 µg/m ³	5.4 µg/m ³
Benzene	Annual	0.006 µg/m ³	12 µg/m ³
Manganese	8 hr	0.13 µg/m ³	4.76 µg/m ³

VIII. General Condition XVII Activities

Work Activity	Schedule	PM ₁₀	SO ₂	NO _X	CO	VOC
None						

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products, Inc. - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

IX. Insignificant Activities

Description	Citation
9,700-gallon resin tanks (2)	Insignificant Activity per LAC 33:III.501.B.5.A.3.
2000-gallon diesel tank	Insignificant Activity per LAC 33:III.501.B.5.A.3.
360-gallon fire pump diesel tanks (2)	Insignificant Activity per LAC 33:III.501.B.5.A.3.
380-gallon fork truck diesel	Insignificant Activity per LAC 33:III.501.B.5.A.3.
950-gallon hydraulic oil tank	Insignificant Activity per LAC 33:III.501.B.5.A.3.
252-gallon gear oil tank	Insignificant Activity per LAC 33:III.501.B.5.A.3.
Debarker	Insignificant Activity per LAC 33:III.501.B.5.D.
252-motor oil tank	Insignificant Activity per LAC 33:III.501.B.5.A.3.
252-gallon transmission oil	Insignificant Activity per LAC 33:III.501.B.5.A.3.
252-lubricating oil tank	Insignificant Activity per LAC 33:III.501.B.5.A.3.
564-gallon used oil tank	Insignificant Activity per LAC 33:III.501.B.5.A.3.
Water treatment additives	Insignificant Activity per LAC 33:III.501.B.8.
250-hp Emergency Diesel Fire Pump Engines (2)	Insignificant Activity per LAC 33:III.501.B.5.D.
Bark/Wood Residue Storage and Handling Equipment	Insignificant Activity per LAC 33:III.501.B.5.A.5.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III Chapter																	
		5▲	509	9	11	13	15	21	2103	2107	2111	2115	2116*	21xx	22	29*	51*	53*	56
UNF 1	Natalbany Plywood Mill	1		1	1	1											1		3
EQT 1	1-94 Wood-fired Boiler	1			1	1	1										1		
EQT 10	2-94 No.1 Veneer Dryer	1				1		2									1		
EQT 2	3-94 No. 2 Veneer Dryer	1				1		2									1		
EQT 3	4-94 Main Cyclone	1				1													
EQT 4	5-94 Chipper Cyclone	1				1													
FUG 1	6-94 Facility Fugitives					1													
EQT 8	2-96 Plywood Press		1				1												
EQT 9	2-01 Gasoline Tank												1						
EQT 11	1-08 Regenerative Thermal Oxidizer	1						1	1										

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill
Agency Interest No.: 31170
Hunt Forest Products, Inc.
Natalbany, Tangipahoa Parish, Louisiana

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill
 Agency Interest No.: 31170
 Hunt Forest Products, Inc.
 Natalbany, Tangipahoa Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHPAP						40 CFR	
		A	K	Ka	Kb	Db	Dc	GG	KKK	III	A	J	V	A	DDDD	H	EEEE	64	68		
UNF 1	Natalbany Plywood Mill																				3
EQT 1	1-94 Wood-fired Boiler																				
EQT 10	2-94 No.1 Veneer Dryer																				1
EQT 2	3-94 No. 2 Veneer Dryer																				1
EQT 4	4-94 Main Cyclone																				3
EQT 4	5-94 Chipper Cyclone																				3
FUG 1	6-94 Facility Fugitives																				
EQT 8	2-96 Plywood Press																				
EQT 9	2-01 Gasoline Tank																			3	
EQT 11	1-08 Regenerative Thermal Oxidizer																		1		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill
Agency Interest No.: 31170
Hunt Forest Products, Inc.
Natalbany, Tangipahoa Parish, Louisiana

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill

Agency Interest No: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF 1 Facility Wide	40 CFR 68 – Chemical Accident Prevention Provisions	DOES NOT APPLY – Facility stores no chemicals above threshold quantities.
EQT 1	40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units	DOES NOT APPLY – Boiler was constructed prior to June 9, 1989. The boiler has not been modified nor has a change in the method of operation occurred since construction. (40 CFR 60.40c)
1-94 Wood-fired Boiler	40 CFR 64 – Compliance Assurance Monitoring	DOES NOT APPLY – No control devices as defined at 40 CFR 64.1.
	LAC 33: III. 1311.B - Emission Standards for Particulate Matter	DOES NOT APPLY. Process rate derived limit does not apply because burning of fuel for indirect heating is not covered under Subchapter A.
	LAC 33: III. 1311.C - Emission Standards for Particulate Matter	DOES NOT APPLY. Opacity limit does not apply because burning of fuel for indirect heating is not covered under Subchapter A. (See opacity limit under Chapter 11.)
	LAC 33:III.Chapter 22 – Control of Emission of Nitrogen Oxides	DOES NOT APPLY – Facility is not located in the Baton Rouge Nonattainment Area or the Region of Influence (LAC 33:III 2201.A.1)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill
Agency Interest No.: 31170
Hunt Forest Products, Inc.
Natalbany, Tangipahoa Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 2 & 10	40 CFR 64 – Compliance Assurance Monitoring	DOES NOT APPLY – Emissions are subject to emission limitation or standards proposed by the Administrator after November 15, 1990, pursuant to Section 111 or 112 of the Clean Air Act (40 CFR 64.2(b)(1)(i)).
2-94 No. 1 Veneer Dryer	LAC 33: III. 1503 - Emission Standards for Sulfur Dioxide	Exempt – emits less than 250 TPY (LAC 33:III.1503.C)
3-94 No. 2 Veneer Dryer	LAC 33: III.2115 - Waste Gas Disposal	EXEMPT. Emissions are a waste gas stream with concentration of VOCs less than 0.44 psia true partial pressure (30,000 ppm) located in Tangipahoa Parish (LAC 33: III. 2115.H.1.d).
EQT 3 Main Cyclone	LAC 33:III Chapter 22 – Control of Emission of Nitrogen Oxides	DOES NOT APPLY – Facility is not located in the Baton Rouge Nonattainment Area or the Region of Influence (LAC 33:III.2201.A.1)
EQT 4 5-94 Chipper Cyclone	40 CFR 64 – Compliance Assurance Monitoring	DOES NOT APPLY – Cyclone is a material handling device with no control device attached as defined at 40 CFR 64.1
	40 CFR 64 – Compliance Assurance Monitoring	DOES NOT APPLY – Cyclone is a material handling device with no control device attached as defined at 40 CFR 64.1

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill
 Agency Interest No.: 31170
 Hunt Forest Products, Inc.
 Natalbany, Tangipahoa Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 8 2-96 Plywood Press	40 CFR 64 – Compliance Assurance Monitoring LAC 33: III.2115 - Waste Gas Disposal	DOES NOT APPLY – Emissions are subject to emission limitation or standards proposed by the Administrator after November 15, 1990, pursuant to Section 111 or 112 of the Clean Air Act (40 CFR 64.2(b)(1)). EXEMPT. Emissions are a waste gas stream with concentration of VOCs less than 0.44 psia true partial pressure (30,000 ppm) located in Tangipahoa Parish (LAC 33: III. 2115.H.1.d). DOES NOT APPLY – Tank volume is <75m ³ .
EQT 9 2-01 Gasoline Storage Tank	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (40 CFR 60.110b). 40 CFR 63, Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (non-gasoline)	DOES NOT APPLY – Gasoline is not defined as an organic liquid for the purposes of this rule (40 CFR 63.2406.Organic Liquid(3)(1)). DOES NOT APPLY – Emissions are subject to emission limitation or standards proposed by the Administrator after November 15, 1990, pursuant to Section 111 or 112 of the Clean Air Act (40 CFR 64.2(b)(1)).
EQT 9 2-01 Gasoline Storage Tank	40 CFR 64 – Compliance Assurance Monitoring	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Hunt Forest Products Inc - Natalbany Plywood Mill

Agency Interest No.: 31170

Hunt Forest Products, Inc.

Natalbany, Tangipahoa Parish, Louisiana

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

40 CFR PART 70 GENERAL CONDITIONS

- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

40 CFR PART 70 GENERAL CONDITIONS

- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]

40 CFR PART 70 GENERAL CONDITIONS

- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;

40 CFR PART 70 GENERAL CONDITIONS

3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated May 3, 2006, along with supplemental information dated May 13, 2007, September 19, 2007, November 1, 2007, January 10, 2008, February 22, 2008, and March 5, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
2. Report by September 30 to cover April through June
3. Report by December 31 to cover July through September
4. Report by March 31 to cover October through December

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 31170 Hunt Forest Products Inc - Natalbany Plywood Mill
Activity Number: PER20060001
Permit Number: 2840-00014-V1
Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	2840-00014	Hunt Forest Products Inc - Natalbany Plywood Mill	CDS Number	06-03-1999
	LAR000058883	Hunt Forest Products Inc	Hazardous Waste Notification	05-19-2005
	LA0097225	WPC File Number	LPDES Permit #	05-22-2003
	WP2032	WPC State Permit Number	LWDPS Permit #	06-25-2003
		Hunt Ply/Plywood	Multimedia	08-05-2002
	32972	Hunt Plywood - Plywood Mill	TEMPO Merge	02-17-2002
Physical Location:		Hwy 51 N Natalbany, LA 70451	Main Phone:	3182510185
Mailing Address:		PO Box 970 Natalbany, LA 704510970		
Location of Front Gate:		30° 33' 0" latitude, 90° 29' 0" longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD83		
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Greg Anthony	PO Box 970 Natalbany, LA 704510970	3182510185 (WP)	Air Permit Contact For Responsible Official for
	J H Hough	PO Box 1263 Ruston, LA 712731263	3182552245 (WP)	Emission Inventory Contact for
	Tracy Purifoy	PO Box 1263 Ruston, LA 712731263	TRACY.PURIFOY@	Emission Inventory Contact for
	Tracy Purifoy	PO Box 1263 Ruston, LA 712731263	3182552245 (WP)	Water Billing Party for
	Tracy Purifoy	PO Box 1263 Ruston, LA 712731263	TRACY.PURIFOY@	Water Billing Party for
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Hunt Forest Products Inc	PO Box 970 Natalbany, LA 704510970	3182510185 (WP)	Air Billing Party for
	Hunt Forest Products Inc	PO Box 970 Natalbany, LA 704510970	3182510185 (WP)	Operates
	Hunt Forest Products Inc	PO Box 970 Natalbany, LA 704510970	3182510185 (WP)	Owns
	Hunt Forest Products Inc	c/o Ben C Hogg Ruston, LA 71270		Agent of Service for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

A ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
 Activity Number: PER20060001
 Permit Number: 2840-00014-V1
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Natalbany Plywood Mill						
EQT0001	1-94 - Wood-fired Boiler		92.3 MM BTU/hr			8760 hr/yr (All Year)
EQT0002	3-94 - Veneer Dyer No. 2		90 MM sq ft/yr	80 MM sq ft/yr		8760 hr/yr (All Year)
EQT0003	4-94 - Main Cyclone			30400 tons/yr		8760 hr/yr (All Year)
EQT0004	5-94 - Chipper Cyclone			10000 tons/yr		8760 hr/yr (All Year)
EQT0008	2-96 - Plywood Press No. 2		260 MM sq ft/yr			8760 hr/yr (All Year)
EQT0009	2-01 - Gasoline Storage Tank	990 gallons		3600 gallons/yr	gasoline	8760 hr/yr (All Year)
EQT0010	2-94 - Veneer Dyer No. 1		160 MM sq ft/yr	140 MM sq ft/yr		8760 hr/yr (All Year)
EQT0011	1-08 - Regenerative Thermal Oxidizer		30000 ft ³ /min	21500 ft ³ /min		8760 hr/yr (All Year)
FUG0001	6-94 - Facility Fugitive Emissions					8760 hr/yr (All Year)

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
Natalbany Plywood Mill							
EQT0001	1-94 - Wood-fired Boiler	62	55000	4.33		85	475
EQT0002	3-94 - Veneer Dyer No. 2	25	3500	2		38	350
EQT0003	4-94 - Main Cyclone	47	20000	3		50	
EQT0004	5-94 - Chipper Cyclone	7	3000	3		19	
EQT0008	2-96 - Plywood Press No. 2					34	95
EQT0009	2-01 - Gasoline Storage Tank			.25		8	
EQT0010	2-94 - Veneer Dyer No. 1	25	3500	2		38	350
EQT0011	1-08 - Regenerative Thermal Oxidizer	28.5	21500	4		35	330
GRP0002	VD CAP - Veneer Dryer Cooling Zone Operational Flexibility CAP	10	7540	4		38	104

Relationships:**Subject Item Groups:**

ID	Group Type	Group Description
CRG0001	Common Requirements Group	CRG 001 - Cyclone Common Requirements Group
CRG0002	Common Requirements Group	CRG 002 - Veneer Dryer Compliance Schedule
GRP0002	Equipment Group	VD CAP - Veneer Dryer Cooling Zone Operational Flexibility CAP
SCN0001	Alternate Operating Scenario	SCN 001 - RTO Routine Maintenance Exemption
UNF0001	Unit or Facility Wide	UNF 001 - Hunt Forest Products, Inc. - Natalbany Plywood Mill

Group Membership:

ID	Description	Member of Groups
EQT0002	3-94 - Veneer Dyer No. 2	CRG0000000002, GRP0000000002

INVENTORIES

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
 Activity Number: PER20060001
 Permit Number: 2840-00014-V1
 Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
EQT0003	4-94 - Main Cyclone	CRG0000000001
EQT0004	5-94 - Chipper Cyclone	CRG0000000001
EQT0010	2-94 - Veneer Dryer No. 1	CRG0000000002, GRP0000000002
EQT0011	1-08 - Regenerative Thermal Oxidizer	SCN0000000001

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multplier	Units Of Measure
0270	Softwood Veneer and Plywood		

SIC Codes:

2436	Softwood veneer and plywood	A131170
------	-----------------------------	---------

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
 Activity Number: PER20060001
 Permit Number: 2840-00014-V1
 Air - Title V Regular Permit Renewal

All phases

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Natalbany Plywood Mill															
EQT 0001 1-94	101.68	144.69	445.34	19.86	28.27	87.01	43.78	49.85	191.76	2.03	2.38	8.88	1.38	1.96	6.04
EQT 0003 4-94							7.29	8.38	31.92						
EQT 0004 5-94							2.40	2.76	10.50						
EQT 0008 2-96													14.84	17.07	65.00
EQT 0009 2-01													0.05	0.05	0.21
EQT 0010 2-94				1.82	2.10	7.99				0.01	0.01	0.05			
FUG 0001 6-94							0.94	0.94	4.11						

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR CRITERIA POLLUTANTSAI ID: 31170 - Hunt Forest Products Inc - **Natalbany Plywood Mill**

Activity Number: PER20060001

Permit Number: 2840-00014-V1

Air - Title V Regular Permit Renewal

Phase I

Subject Item	CO			PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Natalbany Plywood Mill									
EQT 0002 3-94	0.73	0.84	3.20	1.44	1.65	6.30	15.41	17.72	67.50
EQT 0010 2-94	11.87	13.65	52.00	2.56	2.94	11.20	27.40	31.51	120.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 31170 - Hunt Forest Products Inc - Nataibany Plywood Mill

Activity Number: PER20060001

Permit Number: 2840-00014-V1

Air - Title V Regular Permit Renewal

Phase II

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Nataibany Plywood Mill															
EQT 0002 3-94		1.53													1.78
EQT 0010 2-94		0.98													1.14
EQT 0011 1-08	6.42	8.02	28.10	7.55	9.44	33.09	0.80	1.00	3.50	0.01	0.02	0.05	4.90	6.12	21.46
GRP 0002 VD CAP	1.23		5.38											1.43	6.25
SCN 0001	14.49			9.44			4.59			0.02			49.23		

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill

Activity Number: PER20060001

Permit Number: 2840-00014-V1

Air - Title V Regular Permit Renewal

All phases

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 1-94	Acetaldehyde	0.07	0.10	0.29
	Acrolein	0.32	0.46	1.42
	Arsenic (and compounds)	0.002	0.002	0.008
	Benzene	0.34	0.48	1.49
	Cadmium (and compounds)	< 0.001	< 0.001	0.001
	Chromium VI (and compounds)	0.002	0.002	0.007
	Formaldehyde	0.36	0.51	1.56
	Hydrochloric acid	1.54	2.19	6.75
	Lead compounds	0.005	0.10	0.020
	Manganese (and compounds)	0.21	0.30	0.91
	Mercury (and compounds)	< 0.001	< 0.001	< 0.001
	Nickel (and compounds)	0.003	0.003	0.012
	Phenol	0.005	0.01	0.02
	Propionaldehyde	0.005	0.01	0.02
EQT 0008 2-96	Selenium (and compounds)	< 0.001	< 0.001	0.001
	Styrene	0.15	0.22	0.67
	Toluene	0.07	0.10	0.33
	Xylene (mixed isomers)	0.002	0.002	0.010
	Acetaldehyde	0.12	0.14	0.55
	Formaldehyde	0.16	0.19	0.71
EQT 0009 2-01	Methanol	2.76	3.17	12.08
	Methyl ethyl ketone	0.03	0.03	0.11
	Methyl isobutyl ketone	0.02	0.02	0.09
	Phenol	0.04	0.05	0.18
	Benzene	0.005	0.005	< 0.001
	Methyl Tertiary Butyl Ether	0.01	0.01	0.03
	Toluene	0.005	0.005	< 0.01
	Xylene (mixed isomers)	0.005	0.005	< 0.001
	n-Hexane	0.005	0.005	< 0.001

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill

Activity Number: PER20060001

Permit Number: 2840-00014-V1

Air - Title V Regular Permit Renewal

All phases

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill

Activity Number: PER20060001

Permit Number: 2840-00014-V1

Air - Title V Regular Permit Renewal

Phase I

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0002 3-94	Acetaldehyde	0.22	0.26	0.97
	Acrolein	0.01	0.02	0.06
	Benzene	0.01	0.01	0.03
	Formaldehyde	0.16	0.18	0.69
	Methanol	0.50	0.58	2.21
	Methyl ethyl ketone	0.02	0.02	0.09
	Methyl isobutyl ketone	0.07	0.08	0.31
	Phenol	0.10	0.11	0.43
	Propionaldehyde	0.02	0.03	0.11
	Toluene	0.01	0.01	0.05
EQT 0010 2-94	Xylene (mixed isomers)	0.04	0.05	0.18
	Acetaldehyde	1.19	1.37	5.23
	Acrolein	0.16	0.19	0.72
	Benzene	0.10	0.12	0.46
	Formaldehyde	1.20	1.38	5.24
	Methanol	0.76	0.88	3.34
	Methyl ethyl ketone	0.03	0.04	0.15
	Methyl isobutyl ketone	0.05	0.05	0.21
	Phenol	0.29	0.34	1.28
	Propionaldehyde	0.03	0.03	0.13
	Toluene	0.14	0.16	0.59
	Xylene (mixed isomers)	0.07	0.08	0.31

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill

Activity Number: PER20060001

Permit Number: 2840-00014-V1

Air - Title V Regular Permit Renewal

Phase II

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0002 3-94	Acetaldehyde		0.06	
	Formaldehyde		0.02	
	Methanol		0.13	
	Methyl isobutyl ketone		0.07	
	Phenol		0.08	
	Xylene (mixed isomers)		0.04	
EQT 0010 2-94	Acetaldehyde		0.11	
	Formaldehyde		0.03	
	Methanol		0.23	
	Methyl isobutyl ketone		0.12	
	Phenol		0.14	
	Xylene (mixed isomers)		0.08	
EQT 0011 1-08	Acetaldehyde	0.075	0.093	0.327
	Acrolein	0.004	0.005	0.019
	Arsenic (and compounds)	< 0.001	< 0.001	< 0.001
	Benzene	0.012	0.015	0.054
	Beryllium (Table 51.1)	< 0.001	< 0.001	< 0.001
	Cadmium (and compounds)	< 0.001	< 0.001	< 0.001
	Chromium VI (and compounds)	< 0.001	< 0.001	< 0.001
	Formaldehyde	0.085	0.106	0.373
	Manganese (and compounds)	< 0.001	< 0.001	< 0.001
	Mercury (and compounds)	< 0.001	< 0.001	< 0.001
	Methanol	0.072	0.090	0.315
	Methyl ethyl ketone	0.001	0.001	0.004
	Methyl isobutyl ketone	0.001	0.001	0.005
	Nickel (and compounds)	< 0.001	< 0.001	< 0.001
	Phenol	0.12	0.152	0.53
	Propionaldehyde	0.001	0.001	0.003
	Selenium (and compounds)	< 0.001	< 0.001	< 0.001
	Toluene	0.004	0.004	0.015
	Xylene (mixed isomers)	0.002	0.002	0.008
GRP 0002 VD CAP	Acetaldehyde	0.13		0.58

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill

Activity Number: PER20060001

Permit Number: 2840-00014-V1

Air - Title V Regular Permit Renewal

Phase II

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0002 VD CAP	Formaldehyde	0.04		0.16
	Methanol	0.29		1.25
	Methyl isobutyl ketone	0.15		0.68
	Phenol	0.18		0.78
	Xylene (mixed isomers)	0.09		0.41
SCN 0001 SCN 001	Acetaldehyde		1.63	
	Acrolein		0.21	
	Arsenic (and compounds)		< 0.001	
	Benzene		0.13	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Chromium VI (and compounds)		< 0.001	
	Formaldehyde		1.56	
	Manganese (and compounds)		< 0.001	
	Mercury (and compounds)		< 0.001	
	Methanol		1.46	
	Methyl ethyl ketone		0.06	
	Methyl Isobutyl ketone		0.13	
	Nickel (and compounds)		< 0.001	
	Phenol		0.45	
	Propionaldehyde		0.06	
	Selenium (and compounds)		< 0.001	
	Toluene		0.06	
	Xylene (mixed Isomers)		0.13	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
 Activity Number: PER20060001
 Permit Number: 2840-00014-V1
 Air - Title V Regular Permit Renewal

CRG0001 Cyclone Common Requirements Group

Group Members: EQT0003 EQT0004

- 1 [LAC 33.III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33.III.1305.A.1-7.
- 2 [LAC 33.III.507.H.1.a] Cyclone vents: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Perform maintenance as necessary.
- 3 [LAC 33.III.507.H.1.a] Which Months: All Year Statistical Basis: None specified
- 4 [LAC 33.III.507.H.1.a] Cyclone vents: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.
- 5 [LAC 33.III.507.H.1.a] Cyclone vents: Visible emissions monitored by visual inspection/determination daily. Which Months: All Year Statistical Basis: None specified
- 6 [LAC 33.III.507.H.1.a] Cyclone vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

CRG0002 Veneer Dryer Compliance Schedule

Group Members: EQT0002 EQT0010

- 6 [40 CFR 63.6(i)(B)(1)] On-site Construction and Installation of emission control equipment to demonstrate compliance with 40 CFR 63, NESHAP - Subpart DDDD, shall be initiated by August 1, 2008. [40 CFR 63.6(i)(B)(1)]
- 7 [40 CFR 63.6(i)(B)(3)] On-site Construction and Installation of emission control equipment to demonstrate compliance with 40 CFR 63, NESHAP - Subpart DDDD, shall be completed by October 1, 2008. [40 CFR 63.6(i)(B)(3)]
- 8 [40 CFR 63.6(i)(B)(4)] Submittal of Notification of Compliance to determine Final Compliance with 40 CFR 63, NESHAP Subpart DDDD, shall be complete by May 29, 2009. [40 CFR 63.6(i)(B)(4)]
- 9 [40 CFR 63.6(i)(10)(iv)] Performance testing of control equipment installed to demonstrate compliance with 40 CFR 63, NESHAP - Subpart DDDD, shall be completed by March 30, 2009. [40 CFR 63.6(i)(10)(iv)]

EQT0001 1-34 - Wood-fired Boiler

- Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 10 [LAC 33.III.110.B] Which Months: All Year Statistical Basis: None specified
 - 11 [LAC 33.III.1313.C] Total suspended particulate <= 0.6 lb/MMBTU of heat input.
 - 12 [LAC 33.III.1513.C] Which Months: All Year Statistical Basis: None specified
 - 13 [LAC 33.III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

SPECIFIC REQUIREMENTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
 Activity Number: PER20060001
 Permit Number: 2840-00014-V1
 Air - Title V Regular Permit Renewal

EQT0001 1-94 - Wood-fired Boiler

13 [LAC 33:III.507.H.1.a]

Conduct a performance/emissions test: Due within five years, plus or minus 6 months, of when the previous performance test was performed, or within 180 days after the issuance of a permit renewal, whichever comes later. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of permitted maximum capacity. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

Demonstrate compliance with the opacity limits of this permit by visually inspecting EQT001, 1-94 - Woodwaste Fired Boiler, for opacity on a daily basis. If an increase in visible emissions above normal operation is detected, then within three (3) working days, the permittee shall conduct a six minute opacity reading in accordance with 40 CFR 60, Appendix A, Method 9 (qualified observers required). The equipment in this specific condition shall be inspected every six months and whenever visual observations indicate a need, and shall be repaired as necessary. Records of visual and opacity checks (including date and time of the check, emission point identifier, operational status of emission point, observed results and conclusion, and any Method 9 results), and the inspections of the boiler shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (Bbs/MMBTu, gr/dscf, Etc.). Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be no further controls.

EQT0002 3-94 - Veneer Dryer No. 2

18 [40 CFR 63.2241(a)]

Minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heat zone exhausts). Subpart DDDD. [40 CFR 63.2241(a)], Phases: Phase II

Phases: Phase II

Initial compliance demonstration: Develop a plan for review and approval for minimizing fugitive emissions from the veneer dryer heated zones, and submit the plan with the Notification of Compliance Status. Subpart DDDD. , Phases: Phase II

Phases: Phase II

Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.

Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart DDDD by no later than October 1, 2008. Determined as MACT. , Phases: Phase II

Phases: Phase II

Phases: Phase II

SPECIFIC REQUIREMENTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
 Activity Number: PER20060001
 Permit Number: 2840-00014-V1
 Air - Title V Regular Permit Renewal

EQT0008 2-96 - Plywood Press No. 2
 22 [LAC 33:III.5109.A] MACT for EQT008, 2-96 - Plywood Press No. 2, has been determined to be the use of resins with formaldehyde content no greater than 0.11 Wt.-%.

EQT0009 2-01 - Gasoline Storage Tank

- 23 [LAC 33:III.2103.A] Equip with a submerged fill pipe.
- 24 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 25 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 26 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be no further controls.

EQT0010 2-94 - Veneer Dryer No. 1

- 27 [40 CFR 63.2241(a)] Minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heat zone exhausts). Subpart DDDD. [40 CFR 63.2241 (a)], Phases: Phase II Phases: Phase II
- 28 [40 CFR 63.2265] Initial compliance demonstration: Develop a plan for review and approval for minimizing fugitive emissions from the veneer dryer heated zones, and submit the plan with the Notification of Compliance Status. Subpart DDDD. , Phases: Phase II Phases: Phase II
- 29 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.
- 30 [LAC 33:III.5109.A] Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart DDDD by no later than October 1, 2008. Determined as MACT. Phases: Phase II Phases: Phase II

EQT0011 1-08 - Regenerative Thermal Oxidizer

- 31 [40 CFR 63.2240] Option 1: Total hydrocarbon $\geq 90\%$ reduction. Subpart DDDD.
Which Months: All Year Phases: Phase II Statistical Basis: None specified
- 32 [40 CFR 63.2240] Option 2: Total hydrocarbon ≤ 20 ppmvd. Subpart DDDD.
Which Months: All Year Phases: Phase II Statistical Basis: None specified
- 33 [40 CFR 63.2240] Option 3: Methanol $\geq 90\%$ reduction. Subpart DDDD.
Which Months: All Year Phases: Phase II Statistical Basis: None specified
- 34 [40 CFR 63.2240] Option 4: Methanol ≤ 1 ppmvd, if uncontrolled methanol emissions entering the control device are ≥ 10 ppmvd. Subpart DDDD.
Which Months: All Year Phases: Phase II Statistical Basis: None specified
- 35 [40 CFR 63.2240] Option 5: Formaldehyde $\geq 90\%$ reduction. Subpart DDDD.
Which Months: All Year Phases: Phase II Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
Activity Number: PER20060001
Permit Number: 2840-00014-V1
Air - Title V Regular Permit Renewal

EQT0011 1-08 - Regenerative Thermal Oxidizer

- 36 [40 CFR 63.2240] Option 6: Formaldehyde <= 1 ppmdv, if uncontrolled formaldehyde emissions entering the control device are >= 10 ppmdv. Subpart DDDD.
 Which Months: All Year Phases: Phase II Statistical Basis: None specified
 Temperature > 1400 F, for the firebox temperature. Subpart DDDD.
- 37 [40 CFR 63.2240] Which Months: All Year Phases: Phase II Statistical Basis: 3-hour block average
- 38 [40 CFR 63.2251(a)] Justify the need for the routine maintenance on the control device and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe the plan to make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by EPA, if requesting a routine control device maintenance exemption from EPA for routine maintenance events such as control device breakouts, washouts, media replacement, and replacement of corroded parts. Subpart DDDD. [40 CFR 63.2251(a)], Phases: Phase II
 Phases: Phase II
 Minimize emissions to the greatest extent possible during routine control device maintenance periods. Subpart DDDD. [40 CFR 63.2251(d)],
 Phases: Phase II
 Phases: Phase II
- 39 [40 CFR 63.2251(d)] Schedule startup and shutdown of emission control systems, to the extent practical, during times when process equipment is also shut down.
 Subpart DDDD. [40 CFR 63.2251(e)], Phases: Phase II
 Phases: Phase II
- 40 [40 CFR 63.2251(e)] Demonstrate initial compliance with each applicable compliance option, operating requirement, and work practice requirement according to 40 CFR 63 Subpart DDDD Tables 5 and 6. Conduct performance tests and establishing each site-specific operating requirement in 40 CFR 63 Subpart DDDD Table 4. Subpart DDDD. , Phases: Phase II
 Subpart DDDD Table 2 according to the requirements in 40 CFR 63.2262 and 40 CFR 63 Subpart DDDD Table 4. Subpart DDDD. , Phases: Phase II
 Phase II
 Phases: Phase II
 Conduct each performance test according to the requirements in 40 CFR 63.7(e)(1), the requirements in 40 CFR 63.2262(b) through (o), and according to the methods specified in 40 CFR 63 Subpart DDDD Table 4. Subpart DDDD. , Phases: Phase II
 Phases: Phase II
- 41 [40 CFR 63.2260] Temperature monitoring device: Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30F of the process temperature sensor's reading. Subpart DDDD. [40 CFR 63.2269(b)(4)], Phases: Phase II
 Phases: Phase II
- 42 [40 CFR 63.2262] Temperature monitoring device: Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor. Subpart DDDD. [40 CFR 63.2269(b)(5)], Phases: Phase II
 Phases: Phase II
- 43 [40 CFR 63.2269(b)(4)] Temperature monitoring device: Inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion at least quarterly. Subpart DDDD. [40 CFR 63.2269(b)(6)], Phases: Phase II
 Phases: Phase II
- 44 [40 CFR 63.2269(b)(5)] Temperature monitored by temperature monitoring device continuously. Locate the temperature sensor in a position that provides a representative temperature. Subpart DDDD. [40 CFR 63.2269(b)]
 Which Months: All Year Phases: Phase II Statistical Basis: 3-hour block average
- 45 [40 CFR 63.2269(b)(6)]
- 46 [40 CFR 63.2269(b)]

SPECIFIC REQUIREMENTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
Activity Number: PER20060001
Permit Number: 2840-00014-V1
Air - Title V Regular Permit Renewal

EQT0011 1-08 - Regenerative Thermal Oxidizer

- 47 [40 CFR 63.2271(a)] Demonstrate continuous compliance with the applicable compliance options, operating requirements, and work practice requirements in 40 CFR 63.2240 and 63.2241 according to the methods specified in 40 CFR 63 Subpart DDDD Tables 7 and 8. Subpart DDDD. [40 CFR 63.2271(a)], Phases: Phase II
 Phases: Phase II
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.2282(a) through (e), as applicable. Subpart DDDD.
- 48 [40 CFR 63.2282] Phases: Phase II
 Keep records in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1). Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The remaining 3 years may be kept offsite. Subpart DDDD. , Phases: Phase II
 Phases: Phase II
- 49 [40 CFR 63.2283] Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2840-00014-V1. This performance test shall determine the minimum temperature for the firebox which ensures 90% reduction. Permittee shall conduct this test while operating at 90% capacity or higher. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test.

FUG0001 6-94 - Facility Fugitive Emissions

- 50 [LAC 33:III.507.H.1.a] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.

UNF0001 Natalbany Plywood Mill

- 52 [40 CFR 63.2250(a)] Be in compliance with the compliance options, operating requirements, and the work practice requirements in 40 CFR 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction and during the routine control device maintenance exemption specified in 40 CFR 63.2251. Subpart DDDD. [40 CFR 63.2250(a)], Phases: Phase II
 Phases: Phase II
 Operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). Subpart DDDD. [40 CFR 63.2250(b)], Phases: Phase II
 Phases: Phase II
 Develop a written SSMP according to the provisions in 40 CFR 63.6(e)(3). Subpart DDDD. [40 CFR 63.2250(c)], Phases: Phase II
 Phases: Phase II
 Operate in accordance with the SSMP during periods of startup, shutdown, and malfunction. Subpart DDDD. [40 CFR 63.2271(b)(1)], Phases: Phase II
 Phases: Phase II

SPECIFIC REQUIREMENTS

AI ID: 311170 - Hunt Forest Products Inc - Natalbany Plywood Mill
Activity Number: PER20060001
Permit Number: 2840-00014-V1
Air - Title V Regular Permit Renewal

UNF0001 Natalbany Plywood Mill

- 56 [40 CFR 63.2271(b)] Report each instance in which the applicable compliance options, operating requirements, and work practice requirements in 40 CFR 63 Subpart DDDD Tables 7 and 8 were not met in accordance with 40 CFR 63.2281. Subpart DDDD. [40 CFR 63.2271(b)], Phases: Phase II
- Phases: Phase II
- Submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified.
- Subpart DDDD. [40 CFR 63.2280(a)], Phases: Phase II
- Phases: Phase II
- Submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1), if required to conduct a performance test. Subpart DDDD. [40 CFR 63.2280(c)], Phases: Phase II
- Phases: Phase II
- Submit Notification of Compliance Status: Due by the dates specified in 40 CFR 63.2280(d)(1) and (d)(2). Submit the report as specified in 40 CFR 63.9(h)(2)(ii), if required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in 40 CFR 63 Subpart DDDD Tables 4, 5, and 6. Subpart DDDD. [40 CFR 63.2280(d)], Phases: Phase II
- Phases: Phase II
- Submit Notification: Due to EPA within 30 days before taking any of the actions specified in 40 CFR 63.2280(g)(1) through (g)(3). Subpart DDDD. [40 CFR 63.2280(g)], Phases: Phase II
- Phases: Phase II
- Submit compliance status report: Due semiannually, by the 31st of January and July, as specified in 40 CFR 63.2281(b). Include the information specified in 40 CFR 63.2281(c) through (g), as applicable. Subpart DDDD. [40 CFR 63.2281(a)], Phases: Phase II
- Phases: Phase II
- Submit startup, shutdown, malfunction report: Due by fax or telephone within 2 working days after starting actions inconsistent with the startup, shutdown and malfunction plan. Include the actions taken for the event. Submit a letter within 7 working days after the end of the event unless alternative arrangements have been made with DEQ. Include the information specified in 40 CFR 63.10(d)(5)(ii). Subpart DDDD. [40 CFR 63.2281(a)], Phases: Phase II
- Phases: Phase II
- All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Tables 1-10 of 40 CFR 63 Subpart DDDD. , Phases: Phase II
- Phases: Phase II
- Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]

SPECIFIC REQUIREMENTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
Activity Number: PER20060001
Permit Number: 2840-00014-V1
Air - Title V Regular Permit Renewal

UNF0001 Natalbany Plywood Mill

66 [40 CFR 70.6(a)(3)(iii)(B)]

Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(ii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(iii)(B)]

67 [40 CFR 70.6(c)(5)(iv)]

Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]

68 [LAC 33:III.1103]

Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111

69 [LAC 33:III.1303.B]

Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.

70 [LAC 33:III.2113.A]

Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A-1.5.

71 [LAC 33:III.219]

Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.

72 [LAC 33:III.5105.A.1]

Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A, without first obtaining written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard.

73 [LAC 33:III.5105.A.2]

Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.B.

74 [LAC 33:III.5105.A.3]

Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.

75 [LAC 33:III.5105.A.4]

Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.

76 [LAC 33:III.5107.A.2]

Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.

77 [LAC 33:III.5107.A.2]

Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

78 [LAC 33:III.5107.A]

Submit Annual Emissions Report (TEDI): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.

79 [LAC 33:III.5107.B.1]

Submit notification: Due to the Department of Public Safety Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).

SPECIFIC REQUIREMENTS

AI ID: 31170 - Hunt Forest Products Inc - Natalbany Plywood Mill
Activity Number: PER20060001
Permit Number: 2840-00014-V1
Air - Title V Regular Permit Renewal

UNF0001 Natalbany Plywood Mill

- 80 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.
- 81 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931.
- 82 [LAC 33:III.5107.B.4] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.vii.
- 83 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 84 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III. Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 85 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency. Due within 30 days after requested by the administrative authority.
- 86 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 87 [LAC 33:III.919.D] Submit Emission Inventory (EI) Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.